
United States District Court

WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA

v.

ALEJANDRO ZAVALA
[DOB: 09/24/1999]

CODY BONHOMME
[DOB: 03/30/1993]

KALEB ACUNA
[DOB: 03/28/2001]

COUNT ONE

(Conspiracy to Traffick Firearms)

18 U.S.C. §§ 933(a)(1), (a)(3) and (b)

NMT 15 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class B Felony

COUNT TWO

(Intent to Distribute and Possess with the Intent to Distribute Marijuana and Cocaine)

21 U.S.C. §§ 841(a)(1), (b)(1)(C) and 846

NMT 20 Years Imprisonment

NLT 3 Years Supervised Release

Class B Felony

\$100 Mandatory Special Assessment (Per Count)

CRIMINAL COMPLAINT

Case Number: 23-MJ-00060-JAM (LMC)

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT ONE Conspiracy to Traffick Firearms

From on or about March 1, 2023, to on or about May 31, 2023, in the Western District of Missouri, the defendants, ALEJANDRO ZAVALA, CODY BONHOMME, and KALEB ACUNA, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with others both known and unknown, to ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit the following firearms:

- *Anderson AM-15, multi-cal semiautomatic pistol, bearing serial # 22104043
- *Polymer80, Model PF940SC 9 mm pistol, bearing no serial number converted to a machinegun
- *Polymer80 pistol, bearing no serial number, with an uninstalled Machinegun Conversion Device (MCD)
- *Anderson AM-15, multi-cal semiautomatic pistol, bearing serial #22104026 converted to a machinegun
- *Anderson AM-15, multi-cal semiautomatic pistol, bearing serial #22104040 converted to a machinegun
- *Glock, Model 22, .40 caliber pistol, bearing serial number MSE914 converted to a machinegun
- *DPMS, Model A-15, multi caliber, bearing serial number N0000786 converted to a machinegun

*Anderson, AM-15, multi caliber firearm, bearing serial number 22114018 converted to a machinegun
*Anderson, AM-15, multi caliber firearm, bearing serial number 22055738 converted to a machinegun
*2 Polymer80, model PF940SC, 9mm caliber pistols bearing no serial numbers with two uninstalled MCDs

intentionally to another person in or otherwise affecting commerce, knowing, or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1), (3) and (b).

COUNT TWO

Distribute and Possess with the Intent to Distribute Marijuana and Cocaine

From on or about March 1, 2023, to on or about May 31, 2023, in the Western District of Missouri, the defendants, ALEJANDRO ZAVALA, CODY BONHOMME, and KALEB ACUNA, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with others both known and unknown, to knowingly and intentionally distribute and possess with the intent to distribute marijuana, a Schedule I controlled substance, and cocaine, its salts, optical and geometric isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), (b)(1)(D) and 846.

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

(See attached Affidavit),

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No.

John Hegarty
Special Agent John Hegarty
Bureau of Alcohol, Tobacco, Firearms

and Explosives

May 25, 2023 4:30 PM, May 25, 2023

Date

Sworn and subscribed to by telephone,
at Kansas City, Missouri
City and State

HONORABLE LAJUANA M. COUNTS
United States Magistrate Judge
Name and Title of Judicial Officer

Lajuana M. Counts
Signature of Judicial Officer

